



KIMBERLY LAMBERT ADAMS
KATHRYN L. AVILA
BRIAN H. BARR
MICHAEL C. BIXBY
M. ROBERT BLANCHARD
BRANDON L. BOGLE
W. TROY BOUK
WESLEY A. BOWDEN
VIRGINIA M. BUCHANAN
JEFF GADDY
RACHAEL R. GILMER
BRENTON J. GOODMAN
JOSHUA R. HARRIS

FREDRIC G. LEVIN
MARTIN H. LEVIN
D. PATRICK LEWIS
(LICENSED ONLY IN
WASHINGTON, D.C.)
ROBERT M. LOEHR
STEPHEN A. LUONGO
M. JUSTIN LUSKO
NEIL E. McWILLIAMS, JR.
CLAY MITCHELL
PETER J. MOUGEY
DANIEL A. NIGH
TIMOTHY M. O'BRIEN

MIKE PAPANTONIO
CHRISTOPHER G. PAULOS
EMMIE J. PAULOS
MADELINE E. PENDLEY
A. RENEE PRESTON
ROBERT E. PRICE
MARK J. PROCTOR
TROY A. RAFFERTY
MATTHEW D. SCHULTZ
W. CAMERON STEPHENSON
THOMAS A. TAYLOR
REBECCA K. TIMMONS
BRETT VIGODSKY

OF COUNSEL:
WILLIAM F. CASH III
LAURA S. DUNNING
(LICENSED ONLY IN ALABAMA)
BEN W. GORDON, JR.
ARCHIE C. LAMB, JR.
PAGE A. POERSCHKE
(LICENSED ONLY IN ALABAMA)
CHRISTOPHER V. TISI
(LICENSED ONLY IN WASHINGTON, D.C.
AND MARYLAND)
LEFFERTS L. MABIE, JR. (1925-1996)
D.L. MIDDLEBROOKS (1926-1997)
DAVID H. LEVIN (1928-2002)
STANLEY B. LEVIN (1938-2009)

May 15, 2020

Via Email

Covington & Burling LLP
Laura Flahive Wu
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956

RE: Response to May 6, 2020 Letter Concerning DR1

Dear Counsel,

We write in response to your May 6, 2020 letter concerning the Cabell County Commission and City of Huntington's responses to Interrogatories and Requests for Production addressed in Discovery Ruling No. 1. We address each of the discovery requests in turn below.

I. Interrogatory 10

The Cabell County Commission intends to supplement its response to this Interrogatory.

The City of Huntington gave a comprehensive response outlining the many initiatives and efforts Plaintiffs took on to address hazards to public health and safety as a result of the Distributors wrongful conduct. Plaintiffs will disclose expert reports concerning abatement remedies and costs associated therewith in accordance with the Case Management Order and the Federal Rules of Civil Procedure.

II. Interrogatory 11

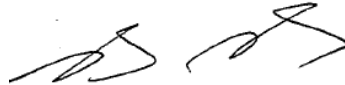
The Cabell County Commission and the City of Huntington have already provided an adequate and sufficient response to this Interrogatory and have nothing further to supplement at this time concerning this Interrogatory.

III. Request for Production 16

The Cabell County Commission has produced many documents responsive to RFP 16 for various County entities across its productions. Given the breadth and volume of the documents produced on this topic, it is not feasible for the Cabell County Commission to provide an exhaustive list of Bates ranges for these documents.

The City of Huntington has produced numerous documents that state, discuss, reflect, or suggest recommendations for programs, initiatives, or actions taken to deal with opioid epidemic, including, but not limited to, the Mayor's Office of Drug Control Policy Strategic Plan, the City of Solutions and the Resiliency Plan. Given the breadth and volume of the documents produced on this topic, it is not feasible for the City of Huntington to provide an exhaustive list of Bates ranges for these documents. However, these programs and initiatives are primarily found in, but not limited to, the custodial files of Jan Rader, Scott Lemley, Steve Williams, Angie Bracey, Bryan Chambers, Hank Dial, Cathy Burns, Kim Bailey and Barbara Miller.

Sincerely,

A handwritten signature in black ink, appearing to be "B. Bogle", written in a cursive style.

Brandon L. Bogle
Levin, Papantonio, Thomas,
Mitchell, Rafferty & Proctor, P.A.

A handwritten signature in black ink, appearing to be "Temitope Leyimu", written in a cursive style.

Temitope Leyimu
Motley Rice LLC